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Joyce Sirianni and Lisa M. Lee
as Special Administrator of the
Estate of Demetrios A. Dalacas

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLIED WORLD SPECIALTY INSURANCE
COMPANY f/k/a DARWIN NATIONAL
ASSURANCE COMPANY and ALLIED
WORLD INSURANCE COMPANY,

Plaintiffs,

vs.

LISA M. LEE, as Special Administrator of the
ESTATE OF DEMETRIOS A. DALACAS,
ESQ., ROBERT O McMASTER, as Special
Administrator of the ESTATE OF
DEMETRIOS A. DALACAS, ESQ.,
DEMETRIOS A. DALACAS, ESQ., P.C., a
Nevada professional corporation; JOYCE
SIRIANNI, and RYAN MCCLARAN,

Defendants.

CASE NO.: 2:21-cv-00078-JCM-EJY

STIPULATION AND
~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME FOR
DEFENDANTS TO FILE THEIR
RESPONSIVE PLEADINGS TO
PLAINTIFFS' COMPLAINT FOR
DECLARATORY JUDGMENT
AND MONEY JUDGMENT

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs
ALLIED WORLD INSURANCE COMPANY f/k/a DARWIN NATIONAL ASSURANCE
COMPANY and ALLIED WORLD INSURANCE COMPANY ("Plaintiffs"), through
their counsel of record, Chad C. Butterfield of WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP; Defendants JOYCE SIRIANNI and LISA M. LEE, as



1 Special Administrator of the ESTATE OF DEMETRIOS A. DALACAS, ESQ., through
2 their counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP;
3 Defendant RYAN McCLARAN, through his counsel of record, Adam J. Breeden of
4 BREEDEN & ASSOCIATES, PLLC; and ROBERT O. McMASTER, as Special
5 Administrator of the ESTATE OF DEMETRIOS A. DALACAS, ESQ., through his
6 counsel of record, John L. Waite III of GOLDSMITH & GUYMON, P.C., that the
7 deadline for all Defendants to file their respective responsive pleadings to Plaintiffs'
8 Complaint for Declaratory Relief and Money Judgment shall be extended forty-nine (49)
9 days from February 26, 2021 to April 16, 2021. This is the first request for extension of
10 time for Defendants Joyce Sirianni, Ryan McClaran, and Lisa M. Lee, as Special
11 Administrator of the Estate of Demetrios A. Dalacas, Esq. to file their responsive
12 pleadings to Plaintiffs' Complaint for Declaratory Judgment and Money Judgment. This
13 is the second request for extension of time for Defendant Robert O. McMaster, as Special
14 Administrator of the Estate of Demetrios A. Dalacas, Esq. as he previously reached an
15 extension of time with counsel for Plaintiffs allowing him until April 9, 2021 to file his
16 responsive pleading. This Stipulation and [Proposed] Order is submitted in accordance
17 with LR IA 6-1.

18 The parties respectfully request this extension of time to file their respective
19 responsive pleadings to Plaintiffs' Complaint. The purpose for the request is to allow
20 Defendants' counsel additional time to resolve outstanding issues concerning the
21 administration of Demetrios A. Dalacas's estate because there were two special
22 administrators appointed to administer the Dalacas estate. These issues directly relate
23 to the responsibilities of the special administrators regarding the litigation of this action
24 as well as who will defend the estate against the claims set forth by Plaintiffs in this
25 action. There is currently a hearing scheduled before the Probate Commissioner in the
26 Eighth Judicial District Court, Clark County, Nevada, for April 2, 2021. Defendants
27 hope to resolve the issues regarding the administration of the Dalacas estate in advance
28 of the April 2, 2021 hearing. However, the hearing before the Probate Commissioner
may become necessary to resolve the issues, which further explains why the parties, out



1 of an abundance of caution, respectfully request a forty-nine (49) day extension of time.
2 This extension of time will ensure all issues involving the administration of the Dalacas
3 estate will be fully resolved before this matter proceeds, which the parties reasonably
4 believe to be necessary.

5 Based on the foregoing, the parties respectfully request this Court to approve the
6 foregoing stipulation for a (49) day extension of time for Defendants to file their
7 respective responsive pleadings to Plaintiffs' Complaint for Declaratory Judgment and
8 Money Judgment. The parties' request is not made in bad faith or to unnecessarily delay
these proceedings.

9 DATED this 2nd day of March, 2021.

DATED this 2nd day of March, 2021.

10 **WILSON, ELSER, MOSKOWITZ,**
11 **EDELMAN & DICKER LLP**

PRINCE LAW GROUP

12
13 /s/ Chad C. Butterfield
14 CHAD C. BUTTERFIELD
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16 Attorneys for Plaintiffs
Allied World Specialty Insurance
17 Company f/k/a Darwin National
Assurance Company and Allied
18 World Insurance Company

/s/ Kevin T. Strong
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Attorneys for Defendant
Joyce Sirianni and Lisa M. Lee, as Special
Administrator of the Estate of Demetrios
A. Dalacas, Esq.

1 DATED this 2nd day of March, 2021.
2 **BREEDEN & ASSOCIATES, PLLC**

DATED this 2nd day of March, 2021.
GOLDSMITH & GUYMON, P.C.

3
4 /s/ Adam J. Breeden
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/s/ John L. Waite III
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Attorneys for Defendant
Robert O McMaster, as Special
Administrator of the Estate of Demetrios
A. Dalacas, Esq.

9
10 **ORDER**

11 **IT IS SO ORDERED.**

12 DATED this 3rd day of March, 2021.

13 
14 UNITED STATES MAGISTRATE JUDGE